

REMARKS

Claims 1-15 were pending in the application before this Amendment. Claims 16-20 were added by this Amendment. Claims 1, 16 and 19 are independent. Claims 1-15 stand rejected. Reconsideration of this application is respectfully requested in light of the above amendments and following remarks.

Claim Rejections Under 35 U.S.C. § 103

Claims 1, 2, 6, 8, 9, 11 and 13-15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mogenis et al. (U.S. Patent No. 6,466,258) in view of Dockes et al. (U.S. Patent No. 5,974,004). This rejection is respectfully traversed.

Mogenis et al. teaches a 911 real time information communication system having cameras and other sensors installed on a customer's premises. The sensors are interconnected with a central station, which monitor conditions on the premises. Upon the occurrence of an emergency requiring dispatching of public safety officials to the site, sensor information is routed to the responding units so that they may monitor conditions within the site during travel, and upon and after arrival.

Specifically, a controller receives audio and video signals, as well as sensor signals, and processes them according to its programming, so as to respond to the emergency situation indicated by the sensors or as indicated by a command transmitted over a signal path. The audio and/or video information is

transmitted from the customer premises to a security center. The controller is connected to a data source that includes such information as floor plans of, and resources available at the customer's premises. The data may be in the form of a database loaded with this or equivalent information. Further, the security center may include a recording or archiving database or memory, which automatically records the video, audio and/or other sensor information arriving at the security center for later use by the responding emergency party, if required, or for evaluation. A playback arrangement may be coupled to the memory.

Dockes et al. teaches a system and method for the production of compact discs on demand that includes acquisition means for acquiring audio data from a plurality of commercial-quality CDs and converting the audio data to digital format. Further, the acquisition means may include a graphical user interface for inputting to a relational database identification data uniquely attributable to the plurality of commercial-quality CDs. Indexing means associate the identification data with their respective audio data in digital format. The acquisition means links the audio data to descriptive elements found in the database (e.g., title, author, date or recording, etc.), such that track titles, artist names, etc. associated with their respective audio data may be searched and retrieved.

There is no teaching or suggestion within the Mogenis et al. and Dockes et al. patent documents that approach the limitations of independent claim 1. In

particular, the combination fails to teach or suggest at least “accessing a *record* in the database using the *client identifier*” and “*linking* the audio file to the *record*” as recited in claim 1. (Emphasis added). Mogenis et al. merely teaches accessing data (e.g. floor plans) for the customer premises based upon a controller receiving data from the customer premises by way of a signal path. Further, Dockes et al. merely teaches associating identification data (e.g., track title) with an audio CD stored in digital format. Thus, the combination fails to teach or suggest linking an audio file to a *record* that is accessed using a *client identifier*.

There is also no teaching or suggestion to combine the references. Applicant submits that one skilled in the art would not be motivated to combine the system disclosed in the Mogenis et al. reference with the non-analogous system disclosed in the Dockes et al. reference. One skilled in the art would not consider a system for producing compact discs when developing an emergency response system. Further, Mogenis et al. is an emergency response system and does not teach or suggest the need for linking an audio file to any record accessed using a client identifier, but merely teaches a playback arrangement for later use. There is no need to link the audio file to the record (e.g., floor plans).

Additionally, there is no teaching or suggestion within the Mogenis et al. and Dockes et al. patent documents that approach the limitations of newly added independent claims 16 and 19. In particular, the combination fails to

teach or suggest at least “accessing a record in the database using the client identifier, the record containing information *relating to an account of the identified client*” and “storing the audio file on a recording media having stored thereon *one or more audio files relating to additional clients*” as recited in claim 16; and a database having “a plurality of records each associated with a client identifier and accessed using the client identifier, the records *configured to identify one or more audio files stored on a recording media relating to a client, with the one or more audio files linked to a client identified by one of the plurality of records*” as recited in claim 19. (Emphasis added).

Further, claims 2, 6, 8, 9, 11 and 13-15 depend from allowable independent claim 1, claims 17 and 18 depend from newly added allowable claim 16, and claim 20 depends from newly added allowable claim 19, and each of these claims are allowable for at least the same reasons that the independent claims from which they depend are allowable.

Therefore, Applicant respectfully submits that the rejection of claims 2, 6, 8, 9, 11 and 13-15 under 35 U.S.C. § 103(a) is improper and should be withdrawn, and that newly added claims 16-20 are also allowable.

Claims 3 and 4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mogenis et al. in view of Dockes et al. as applied to claim 1, and further in view of DeMartin et al. (U.S. Patent No. 6,226,672). Claims 5 and 10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mogenis et

al. in view of Dockes et al. as applied to claims 1 and 8, and further in view of Kelly et al. (U.S. Patent No. 6,047,292). Claims 7 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mogenis et al. in view of Dockes et al. as applied to claims 1 and 8, and further in view of Akagiri (U.S. Patent No. 5,491,481). These rejections are respectfully traversed.

Applicant submits that even from a cursory review of DeMartin et al., Kelly et al. or Akagiri, there are no teachings or suggestions within these patent documents that approach the limitations of the independent claims as discussed above. Therefore, DeMartin et al., Kelly et al. or Akagiri fail to make up for the deficiencies of the combination of Mogenis et al. in view of Dockes et al. and claims 3 and 4, 5 and 10, and 7 and 12, respectively are allowable for at least the same reasons that the independent claims from which they depend are allowable.

#### CONCLUSION

Accordingly, in view of the above amendments and remarks, and all of the stated grounds of rejection having been properly traversed, accommodated, and/or rendered moot, reconsideration of the rejections and allowance of claims 1-20 in connection with the present application is earnestly solicited. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

Should there be any outstanding matters that need to be resolved in the application before allowance thereof, the Examiner is invited to contact Gary D. Yacura (Reg. No. 35,416) at (703) 668-8023.

Pursuant to 37 C.F.R. 1.17 and 1.136(a), the Applicant respectfully petitions for a two (2) month extension of time for filing a response in connection with the present application, and the required fee of \$410.00 is attached.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. 1.16 or under 37 C.F.R. 1.17; particularly, extension of time fees.

Respectfully submitted,

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